

how best to deal with student encampments to prevent major disruptions to a university's educational mission.

5. In the Spring of 2024, students began conducting more protests on UH's campus. Campus officials track those activities to ensure there are no conflicts with space usage on campus.

6. In approximately April 2024, SJP members were in Butler Plaza on UH's campus chalking messages on sidewalks. This was a violation of the University's anti-chalking policies and was tantamount to graffiti. The University power washed the messages and the students returned the next day to re-write the messages. After two consecutive days of power washing the messages, the students stopped.

7. On April 17, 2024, I met with members of Students for Justice in Palestine, along with their faculty advisor, Dr. David McNally, and other members of UH's administration. The purpose of the meeting was to discuss how GA-44 would be worked into University policies on our campus and throughout the UH system. The SJP students raised the issue of chalking. University personnel reiterated the policy regarding chalking and also stressed that buildings are not all open forums for free expression.

8. On April 25, 2024, UH administrators met with Hillel to understand their concerns. The University explained that GA-44 would be implemented into freedom of expression and anti-discrimination policies but that the sentiment is not different from current policies, which already prohibited disruptions to campus educational functions and extended protections based on national origin, race, religion, sex, and all other protected categories consistent with state and federal law.

9. Between April 22 and April 25, 2024, students organized in the student center. They wore t-shirts and wrote signs with "Free Palestine" messaging. After students began affixing signs to the wall, they were asked to take them down because UH's policies do not permit protest-related signs inside the Student Center or other campus buildings—regardless of the content or viewpoint being expressed. The students who were hanging signs were escorted out of the Student Center.

10. By April 25, 2024, SJP escalated its protests. Approximately 50-75 students assembled in the main entrance of the student center with banners and flags. They were shouting and standing on furniture. Eventually they dispersed.

11. On May 8, 2024, I arrived early on campus to find an encampment on the steps of Butler Plaza, which is outside one of the libraries. Approximately 70 students were organized, as truly and accurately depicted in the photograph below:



12. Students were told they could not have an encampment due to state laws about camping on state property. Two students were arrested following a confrontation with UH police. It was also discovered that students had taken University property to aid in their encampment. Specifically, the students took wood pallets that are used to transport items across campus and used them as barricades in Butler Plaza (see below). A Palestinian flag was placed on the makeshift barricade.

13. Attached hereto as **Exhibit A** (file name IMG_8035) is a true and accurate copy of video footage showing the encampment at Butler Plaza on May 8, 2024.

Further declarant sayeth naught

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF TEXAS AND THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on August 16, 2024.

A handwritten signature in black ink, appearing to read 'Paul Kittle', written over a horizontal line.

Paul Kittle,
Vice President of Student Affairs at the
University of Houston

EXHIBIT A

Video footage of May 8, 2024 SJP encampment in Butler Plaza at UH, file name IMG_8035

This exhibit constitutes a video recording, a copy of which has been delivered to the Court.